

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Special Services Fees and Classifications) Docket No. MC96-3

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS JOHN F. LANDWEHR
(OCA/USPS-T3-13-24)
(August 8, 1996)

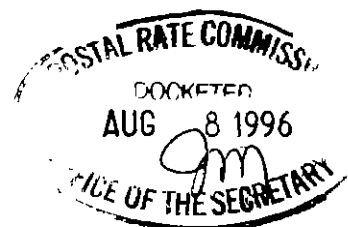
Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA Interrogatories 1-4 to the United States Postal Service dated June 19, 1996, are hereby incorporated by reference.

Respectfully submitted,

Gail Willette

GAIL WILLETTE
Director
Office of the Consumer Advocate

Emmett Rand Costich for
SHELLEY DREIFUSS
Attorney



OCA/USPS-T3-13. Refer to page 4, lines 9-11, of your testimony.

- a. Please explain the rationale for not providing delivery within the corporate limits of Middleburg, given that approximately two-thirds of the 1,856 box holders are residents and "all city residents and businesses rely on post office boxes for mail delivery."
- b. How much box revenue would be lost to the Middleburg Post Office if delivery service were provided within the corporate limits?

OCA/USPS-T3-14. Refer to page 4, lines 16-17, of your testimony concerning non-resident box holders. Please explain how you determined that one third of post office box customers "reside outside the service area of the office."

OCA/USPS-T3-15. Refer to page 4, lines 21-24, of your testimony concerning "temporary forwarding orders."

- a. Please confirm that the Postal Service does not charge post office box (or other) customers a fee for the forwarding of mail or change of address orders. If you do not confirm, please explain.

- b. Please estimate the number of temporary forwarding orders generated by residents and non-residents, and state the time period during which these orders were generated.
- c. Please confirm that the cost of processing a temporary forwarding order is the same for a non-resident as it is for a resident box holder. If you do not confirm, please explain.

OCA/USPS-T3-16. Refer to page 6, footnote 1, of your testimony.

- a. At what stage in the planning process is the new facility for San Luis, AZ?
- b. What is the expected date of opening of this new facility?

OCA/USPS-T3-17. Refer to page 7, lines 16-18, of your testimony.

Please confirm that resident and non-resident box holders are "recipients of benefit checks from federal and state authorities." If you do not confirm, please explain.

OCA/USPS-T3-18. Refer to page 7, lines 18-19, of your testimony.

- a. Please explain the policy of the Postal Service with respect to responding to Freedom of Information Act requests.
- b. Please explain "[t]he process for responding to" Freedom of Information Act requests.

- c. Please explain whether Freedom of Information Act requests on behalf of non-residents are proportionately greater than such requests on behalf of residents.
- d. Please confirm that the cost of processing Freedom of Information Act requests on behalf of non-residents is the same as the cost of processing such requests on behalf of residents. If you do not confirm, please explain.
- e. Does the Postal Service request reimbursement for whatever costs are incurred in processing Freedom of Information Act requests? Please explain.

OCA/USPS-T3-19. Refer to your testimony at pages 7-8, lines 25-26, and lines 1-2, respectively, of your testimony. Please confirm that the Postal Service provides box service only where the person(s) whose name(s) is listed on the box application form (PS Form 1093) matches the name(s) on the mail piece.

- a. If you do not confirm, please explain under what circumstances the Postal Service provides box service to a person(s) not named on the box application form.
- b. If you do confirm, please explain how "[u]se of the box is difficult to control."

OCA/USPS-T3-20. Refer to your testimony at pages 7-8, lines 22-26 and lines 1-8, respectively. Also, refer to pages 9-10, lines 25-26 and lines 1-11, respectively. Please confirm that the "administrative requirements" ascribed to non-resident box customers on the above referenced pages will not be reduced, even if the Commission recommends the Postal Service's proposal for post office boxes. If you do not confirm, please explain the basis for your conclusions.

OCA/USPS-T3-21. Refer to page 9, lines 5-6, of your testimony.

- a. What proportion of all box holders in the Blaine Post Office is made up of Canadian citizens?
- b. Please confirm that "Canadian citizens who own vacation property" in the Blaine delivery area could avoid the proposed non-resident fee by providing proof of residency, such as a "utility hookup (gas, electric, water, sewage, trash), a current lease, a mortgage, a deed of trust, a cable TV hook-up or bill, or any other verifiable proof of a street address." (See, USPS-T-7 at 24.)

OCA/USPS-T3-22. Refer to page 10, lines 14-16, of your testimony.

- a. Please provide all surveys, data, studies, reports or other material that support the conclusion that "there are also many similar offices nationwide."
- b. Please provide the number of similar offices nationwide, with reference to any of the information requested in (a) above.
- c. If you are unable to provide the information requested in (b) above, please estimate, based upon your experience, the number of similar offices nationwide.

OCA/USPS-T3-23. Please refer to your response to OCA/USPS-T3-4.

- a. In response to OCA/USPS-T3-4a, you mention one possibility for post office box assignment. Are you aware of other methods used by postmasters for post office box assignment? If so, please describe them.
- b. In response to OCA/USPS-T3-4a, you state that you instruct your employees to assign post office boxes sequentially. Are you aware of other postmasters who similarly instruct their employees? If so, please describe any similarities and differences with the method you use.
- c. In response to OCA/USPS-T3-4a, you state, "There are no regulations or guidelines for this process." Are there any regulations or guidelines regarding efficient management or

operation of post office box sections? If so, provide them. Are postmasters evaluated positively for efficient utilization of resources in operating their offices? Please explain.

- d. Your response to OCA/USPS-T3-4b states that sequential assignment of boxes results in efficient distribution of mail to boxes. Would it be inefficient to assign the 20 boxes in no particular pattern (randomly) as opposed to your method? Please explain.

OCA/USPS-T3-24. Please assume the following: (1) Two Postal Service customers work in a Zip Code area that differs from the Zip Code area in which they reside. (2) Customer A rents a post office box in the area near his office and thus checks his box at least once a day. Mail volume rarely exceeds box capacity.

(3) Customer B rents a post office box in the Zip Code area where he resides. He does not visit his box on a daily basis. Accumulated volume may frequently exceed box capacity.

- a. Given the Postal Service's stated concern in MC96-3 that non-resident mail volumes frequently present problems due to inadequate mailbox capacity and the scenario presented in this interrogatory, which customer would a postmaster prefer?

- b. Please explain the rationale for charging a non-resident fee to Customer A, whose mail volumes are less likely to exceed box capacity than are Customer B's.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 3.B(3) of the special rules of practice.

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SHELLEY DREIFUSS
Attorney

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